

EXHIBIT 1

IN THE CIRCUIT COURT OF THE THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

2024MR000124

William Rogers

vs.

Case No. 24-MR-

Roxana Church of the Nazarene

Comes now William Rogers, and states as follows:

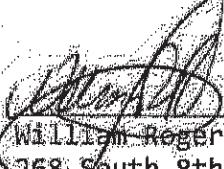
1. Plaintiff William Rogers is a resident of Madison County, Illinois.
2. That Defendant Church of the Nazarene is an organization of Madison County, in which Plaintiff is and was a member.
3. That the bylaws of the Church set forth how to expel a member and for what reasons.
4. That Plaintiff, as a member of this organization, is an intended beneficiary of this written agreement.
5. That in violation of this written agreement, Defendant has purported to expel Plaintiff from attending meetings and otherwise appearing at and with said organization.
6. That Defendant breached the agreement in one or more of the following ways:
 - A. Sought to expel Plaintiff based on lawful political action that took place off premises by Plaintiff, and/or
 - B. Failed to allow Plaintiff to have a representative of his choice at the hearing to determine whether to expel Plaintiff, in violation of written bylaws, and/or
 - C. Failed to provide to Plaintiff a member to zealously argue for and represent Plaintiff at the hearing to determine whether to expel Plaintiff, in violation of these bylaws.
7. As a proximate cause of the foregoing, Plaintiff's rights of membership have

been violated, and that Plaintiff has been purportedly barred from attending meetings.

8. That Plaintiff is suffering irreparable harm as a result.

WHEREFORE, Plaintiff Humbly requests this Honorable Court enter an order declaring Defendant's purported expulsion of his VOID and WITHOUT lawful effect, and barring Defendant from instituting any proceedings against Plaintiff except in compliance with its own bylaws.

April 22, 2024


William Rogers
268 South 8th
Wood River, IL 62095
618/910-7151



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Business Entity Search

Entity Information

Entity Name	ROXANA CHURCH OF THE NAZARENE		
File Number	56554351	Status	ACTIVE
Entity Type	CORPORATION	Type of Corp	NOT-FOR-PROFIT
Incorporation Date	10-01-1991		
(Domestic)			
Duration	PERPETUAL		
Date			
Annual Report	11-02-2023	Annual Report Year	2023
Filing Date			
Agent Information	RODNEY DURR 500 N CENTRAL AVE ROXANA ,IL 62084	Agent Change Date	12-11-2019

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